

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2003 DEC 10 P 4:08

03 CR 10376 PBS

UNITED STATES OF AMERICA

v.

EDER D. COELHO, a/k/a

EDVARDO VIANA LUCAS, a/k/a

LEVAN DE CHANTAL and

ABRAO A. OLIVEIRA, a/k/a

ABRAAO ALVES DE OLIVEIRA a/k/a

KEVIN BRAY,

Defendants.

Crim. No. 03-

U.S. DISTRICT COURT

DISTRICT OF MASS.

) 18 U.S.C. § 371 (Conspiracy);

) 18 U.S.C. § 1028(a)(3)

) (Identification Document Fraud);

) 18 U.S.C. § 1546(a)

) (Use of Fraudulent Visas);

) § 1324(a)(1)(A)(iv)

) (Alien Harboring/Inducement)

)

INFORMATION

COUNT ONE: 18 U.S.C. § 371 - Conspiracy

The United States Attorney charges that:

From a date unknown to the United States Attorney, but from not later than July 25, 2003 until September 10, 2003, at Everett, Malden and Boston, and elsewhere within the District of Massachusetts,

EDER D. COELHO and ABRAAO A. OLIVEIRA, defendants herein, did unlawfully, willfully, and knowingly combine, conspire, confederate and agree with one another, and with one or more other persons, known and unknown, to commit offenses against the United States, to wit: to knowingly possess and transfer five or more false identification documents, in violation of 18 U.S.C. § 1028(a)(3).

OVERT ACTS

In furtherance of the conspiracy and to effect the objects

thereof, the defendants committed the following overt acts, among others, in the District of Massachusetts:

1. On July 25, 2003, Coelho contacted a confidential source of the Federal Bureau of Investigation and offered the confidential source an opportunity to join an alien smuggling operation by participating as a "runner and broker" of counterfeit documents manufactured by the alien smuggling operation. Coelho offered the confidential source an opportunity to transport illegal aliens for the alien smuggling operation to the Massachusetts Registry of Motor Vehicles ("RMV"), where the illegal aliens would use fraudulent documents to obtain legitimate Massachusetts driver's licenses.
2. On July 30, 2003, Coelho, Oliveira and the confidential source met at 236 Elm Street, 2nd floor, in Everett, Massachusetts to further discuss the transportation of undocumented aliens to the RMV by the confidential source, and the manufacture and delivery of counterfeit documents that would be used in the operation. Coelho showed the confidential source a locked room within the apartment that contained "document-making" implements which included a computer, printer, scanner and shredder. Coelho stated that this was his office where

they printed and produced the counterfeit documents.

3. At that time, Oliveira and Coelho both received mail at 236 So. Elm Street, 2nd floor, Malden, Massachusetts.

#### **The First Undercover Meeting**

4. On August 1, 2003, Coelho met with the confidential source to facilitate getting an undocumented alien a driver's license. At the direction of Coelho, the confidential source transported a person whom the confidential source was told was an alien to the RMV in Lowell, Massachusetts. At the registry, the alien applied for a driving permit and presented a purported United States visa, among other documents, to the registry officials.

#### **The Second Undercover Meeting**

5. On August 11, 2003, Coelho spoke to the confidential source on the phone and arranged for the drop-off and transport of an alien to the RMV in Haverhill, Massachusetts in order to get a Massachusetts driver's license. Coelho stated that the alien would be presenting a counterfeit United States visa, a counterfeit Brazilian birth certificate, and other identity documents to the registry officials. Coelho directed the confidential source to help translate the fraudulent documents and official registry documents

into Portuguese for the alien. Coelho provided the alien with the following fraudulent documents: a Brazilian Passport in the name of Joseio Filipe Martins, DOB 12/12/1975 bearing Passport Number (CJ 8855906); a United States Immigration I-94 Entry/Exit Document bearing Admission Number (12563541225); and a United States Visa bearing Foil Number (49564525).

6. Also on August 11, 2003, the confidential source met with Coelho at 236 South Elm Street, 2nd floor in Everett, MA. At the meeting, the confidential source gave Coelho \$2,000.00, including a check in the amount of \$1,300.00 and \$700.00 in United States currency. The undocumented alien had given the confidential source the funds in exchange for the fraudulent visa, birth certificate and license which Coelho provided.
7. The \$1,300.00 signed blank check given to Coelho on August 11, 2003 by the confidential source for the fraudulent documents was later made out to defendant Oliveira and deposited into a Fleet bank account in the name of Oliveira.

#### **The Third Undercover Meeting**

8. On August 22, 2003, Coelho talked to the confidential source on the phone and arranged for the confidential source to meet with and transport another undocumented

alien to the RMV in Haverhill, Massachusetts on behalf of Coelho and Oliveira. The confidential source was further instructed by Coelho to help the alien apply for a driving permit and license. Coelho told the confidential source he would supply the confidential source with a set of documents for the alien to use at the RMV.

9. Also on August 22, 2003, the confidential source transported an undocumented alien by the name of Caludiano Da Silva to the RMV located in Haverhill, Massachusetts. At the RMV, the undocumented alien presented the visa, passport, and other documents to RMV officials in order to get a driver's permit. The undocumented alien provided the following fraudulent documents supplied by Coelho: Brazilian passport bearing the name CLAUDIANO DA SILVA BARRETO, with a year of birth of 1980, Passport Number: (CL 689044); United States Visa bearing Control Number (20000335552514) and Foil Number (48564021); and U.S. Immigration I-94 Entry/Exit Document bearing Admission Number (23215478208).
10. Also on August 22, 2003, the confidential source gave Coelho \$2,500.00 in U.S. currency on behalf of the undocumented alien for the fraudulent documents and

driver's permit which the alien provided to the confidential source. Also present at the meeting was Oliveira.

11. On September 3, 2003, Coelho and the confidential source conducted a phone conversation regarding fraudulent documents. Coelho informed the confidential source that he had recently moved and was now residing at 252 Kennedy Drive, Apt. 713, Malden, Massachusetts, 02148.
12. Also on September 3, 2003, the confidential source met with Coelho at his new residence located at 252 Kennedy Drive, Apt. 713, Malden, Massachusetts. The purpose of the confidential source's visit was to place an order for a fraudulent visa, I-94, Brazilian birth certificate and other documents. The confidential source gave Coelho a Brazilian passport, bearing the name of Wilton Zaquias Da Silva, with a year of birth of 1973. During this meeting the confidential source spoke with Coelho and Oliveira.

#### **The Fourth Undercover Meeting**

13. On September 4, 2003, Coelho spoke to the confidential source on the phone regarding the fraudulent documents and the passport that the confidential source dropped off at 255 Kennedy Drive, Apt. 713, Malden,

Massachusetts. Coelho further informed the confidential source that the fraudulent documents would be ready for pick-up by the confidential source by the morning of September 5, 2003.

14. On September 5, 2003, Coelho and Oliveira met with the confidential source and delivered the fraudulent documents - a visa, an I-94, a Brazilian birth certificate, and a cancelled check in the false name of Wilton Zaquias Da Silva to the confidential source.

All in violation of 18 U.S.C. § 371.

**COUNT TWO:        18 U.S.C. §§ 1028(a)(3) - Identification Document  
Fraud**

The United States Attorney further charges that:

From a date unknown to the United States Attorney, but from not later than July 25, 2003 until September 10, 2003, at Everett and Malden, and elsewhere within the District of Massachusetts,

EDER D. COELHO and ABRAAO A. OLIVEIRA, defendants herein, did knowingly possess with intent to use unlawfully, five or more identification documents and false identification documents, to wit: thirty-nine false passports purportedly issued by the Federative Republic of Brazil; two false passports purportedly issued by the Republic of El Salvador; one false passport purportedly issued by the Republic of Ecuador; two false passports purportedly issued by the United Mexican States; one false European Community passport purportedly issued by the Republic of Italy, and three false European Community passports purportedly issued by the Portugese Republic. All in violation of 18 U.S.C. § 1028(a)(3).



**COUNT THREE:**            **18 U.S.C. §§ 1546(a) - Use of a Fraudulent Visa**

The United States Attorney further charges that:

From a date unknown to the United States Attorney, but from not later than July 25, 2003, until September 10, 2003, at Everett and Malden, and elsewhere within the District of Massachusetts,

EDER D. COELHO and ABRAAO A. OLIVEIRA, defendants herein, did knowingly utter, use, attempt to use, possess, obtain, accept and receive non-immigrant visas for entry into the United States, and evidence of authorized stay or employment in, the United States, knowing such visas and evidence to be forged, counterfeited, altered, and falsely made, and to have been procured by means of any false claim or statement, and to have been otherwise procured by fraud and unlawfully obtained; to wit: twenty-one falsely-made United States visas, visa control numbers and/or visa foil numbers, including eighteen falsely-made United States visas contained within passports purportedly issued by the Federative Republic of Brazil; one falsely-made United States visa contained within a passport purportedly issued by the Republic of El Salvador; and two partially-completed, falsely-made United States visas not affixed within another document.

All in violation of Title 18, United States Code, section 1546(a).

**COUNT FOUR:      8 U.S.C. § 1324(a)(1)(A)(iv) (Knowing Inducement  
To Alien To Enter Or Reside In The United States)**

The United States Attorney further charges that:

From a date unknown to the United States Attorney, but from not later than July 25, 2003, until September 10, 2003, at Everett, Malden and Boston, and elsewhere within the District of Massachusetts,

EDER D. COELHO and ABRAAO A. OLIVEIRA, defendants herein, did encourage or induce one or more aliens to come to, or reside in the United States, knowing or recklessly disregarding the fact that such coming to, entry, or residence was in violation of the law, to wit: an undocumented alien on August 11, 2003, to whom Defendants provided false documentation in the name Joseio Filipe Martins; an undocumented alien on August 22, 2003, to whom Defendants provided false documentation in the name Caludiano Da Silva; a purportedly undocumented alien on September 5, 2005, to whom Defendants provided false documentation in the name Wilton Zaquias Da Silva.

All in violation of Title 8, United States Code, section 1324(a)(1)(A)(iv).

Respectfully submitted,  
MICHAEL J. SULLIVAN  
United States Attorney

By: 

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DATED:      December 10, 2003